

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION

AGXPLORE INTERNATIONAL, LLC,)	
)	
)	
Plaintiff,)	
)	Case No.
v.)	
)	
JOSEPH DANIEL SHEFFER, et al.)	
)	
Defendants.)	
)	

PLAINTIFF’S MOTION FOR SEALING

Plaintiff AgXplore International, LLC (“**AgXplore**”), respectfully submits this Motion for Sealing, pursuant to Local Rule 13.05. AgXplore seeks to file the following documents under seal in this matter:

- (1) Exhibit 6, which includes emails Defendant Jeremy Sheffer forwarded from his AgXplore email account to Jeremy Sheffer’s containing sensitive, proprietary, and Confidential Information concerning AgXplore’s business operations.

This Motion is not being made for any improper purpose and is instead being made to protect the confidentiality of information so designated by the parties. Section 3.a of Defendants Jeremy Sheffer’s and Daniel Sheffer’s individual Non-Solicitation and Non-Disclosure Agreements define Confidential Information as:

all information not generally known to the public, in spoken printed, electronic or any other form or medium, including but not limited to information relating directly or indirectly to the following: (a) research and development information; (b) information concerning any of [AgXplore’s] products or proprietary technology . . .; (c) pending projects or proposals; (d) supplier, material, design, manufacturing, and production specifications or standards; (e) manufacturing and production processes and techniques; (f) books, records, and electronic files relating to the business of [AgXplore]; (g) business plans and strategies; (h) purchase, sales, and marketing plans and information; (i) customer names, addresses, and other contact

information; (j) price lists, pricing information, and pricing methods; (k) cost lists and costs information; (l) the specific needs and requirements of particular customers; (m) customer service requirements; (n) terms and conditions of customer contracts; (o) supplier and vendor names and contact information and terms and conditions of supplier and vendor contracts; (p) systems and equipment; and (q) to the extent not already covered by (a) through (p), all trade secrets of [AgXplore].

Exhibit 6 includes a series of emails that Defendant Jeremy Sheffer forwarded from his AgXplore email account to his personal email account on October 26, 2022—just a few days before his separation from AgXplore—attaching various spreadsheets and data containing AgXplore’s customer-specific sales information and trade secrets. The forwarded emails constitute proprietary and Confidential Information as defined by Defendants Jeremy Sheffer’s and Daniel Sheffer’s separate Non-Solicitation and Non-Disclosure Agreements concerning AgXplore’s revenue, sales, customers, and pricing. Because Exhibit 6 contains Confidential Information as defined by the agreements at issue in this action, Plaintiff requests that Exhibit 6 be sealed and remain sealed until a time when this Court deems it appropriate to unseal.

Dated: June 20, 2023

Respectfully submitted,

By: /s/ Ida S. Shafaie

Ida S. Shafaie, #66220MO
Mark P. Ohlms, #69262MO
Armstrong Teasdale LLP
7700 Forsyth Boulevard, Suite 1800
St. Louis, Missouri 63105
314.621.5070
314.621.5065 (Facsimile)
ishafaie@atllp.com
mohlms@atllp.com

**ATTORNEYS FOR PLAINTIFF
AGXPLORE INTERNATIONAL, LLC**

CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of June 2023, the foregoing was electronically filed with the Clerk of the Court and sent via U.S. Mail and email to:

Nicole A. Truso
Faegre Drinker Biddle & Reath LLP
2200 Wells Fargo Center, 90 South Seventh Street
Minneapolis, MN 55402
nicole.truso@faegredrinker.com

Attorney for Meristem Crop Performance Group, LLC

Jeremy Sheffer
329 N Main St
Cape Girardeau, MO 63701
jsheffer13@gmail.com

Joseph Daniel Sheffer
2573 Silversmith Court
Cape Girardeau, MO 63701
danielsheffer13@gmail.com

/s/ Ida S. Shafaie
Ida S. Shafaie